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Attorneys for Defendant,  
Patrick Byrne

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

ROBERT HUNTER BIDEN, an  
individual,

Plaintiff,

vs.

PATRICK M. BYRNE, an individual,  
Defendant.

Case No.: 2:23-cv-09430-SVW-PD  
Judge: Honorable Stephen V. Wilson  
Courtroom: "10A"

Complaint Filed: November 8, 2023

**DECLARATION OF KIMBERLY  
CARMAN IN SUPPORT OF  
DEFENDANT'S BRIEF REGARDING  
DEPOSITION DISCOVERY ISSUES**

**Date:** October 4, 2024  
**Time:** 9:00 a.m.  
**Loc:** Hon. Patricia A. Donahue  
**Ctrm:** 580

**DECLARATION OF KIMBERLEE CARMAN**

I, Kimberlee Carmen, declares as follows:

1. I am over eighteen years of age. I am the Director of Operations for Optima Juris International Deposition Agency. I am a former certified shorthand reporter in the State of California. I am personally familiar with the facts set forth in my Declaration and if called upon I could and would competently testify to the foregoing.

2. Optima Juris International Deposition Agency, ("Optima") has been in operation for twenty-four years. It specializes in taking international depositions in foreign countries. I am personally aware of and have been involved in the setting up of many international depositions for Optima customers to be taken in foreign countries that involved United States District Court cases.

3. Prior to setting up the taking a deposition in a foreign country for a customer, my practice for our company is to check the United States State Department website and determine what rules and restrictions exist for the applicable country that must be complied with to obtain its consent before a deposition can be taken in a foreign country. These rules that are published on the state department's website consist of Hague Convention rules if the applicable country is a signatory to those rules as well as the rules of the country that relate to the taking of depositions in that country. Normally, based on my experience in assisting Optima's customers to obtain consents from foreign countries to take depositions in those jurisdictions when consent is required, it has taken two to six months or more to obtain consent from the foreign country to take a deposition when such consent is required in that country.

4. I have also been involved in the setting up and the taking of many depositions in Dubai including in United States District Court cases. The United States State Department's website, of which I have reviewed hundreds of times, currently confirms that there are no Hague Convention requirements or any other

1 rules or laws that prohibit the taking of depositions in the United Arab Emirates in  
2 Dubai. All that is necessary to take an in-person deposition in Dubai is to make  
3 travel arrangements and go to Dubai to take the deposition. A certified shorthand  
4 court reporter in California that is qualified to depose a witness or party in a United  
5 States District Court case must be brought to Dubai to take the in-person  
6 deposition because there are no California certified and qualified depositions  
7 reporters living in Dubai that can take a deposition in Dubai that meet the  
8 requirements to have a proper deposition taken.

9 5. I have been involved in setting up zoom depositions for the taking of  
10 depositions of people who reside in Dubai by zoom. The court reporter is located  
11 here in California and is certified to take the deposition and can take it using zoom.  
12 The videographer is here and can attend the deposition by zoom. Counsel for the  
13 parties can attend the zoom deposition wherever their office is located. Other  
14 parties can attend the zoom deposition from their home or office. The deponent can  
15 attend and have his deposition taken from his home, office or conference room in  
16 Dubai. Exhibits can be shown to the witness during the deposition and can be  
17 questioned in the same manner as an in-person deposition. And the parties will  
18 save thousands of dollars in attorney's fees and costs that would otherwise be  
19 charged to travel to and attend a deposition in Dubai. For cost savings and time  
20 efficiency, a zoom deposition is the best method to depose a witness or party in  
21 Dubai and particularly since there are no restrictions by the United Arab Emirates  
22 on the taking of depositions in Dubai or of people who reside in Dubai.

23 I declare under penalty of perjury and under the laws of the United States of  
24 America that the foregoing is true and correct and that this Declaration was  
25 executed this 9<sup>th</sup> day of October, in Irvine, California.

26 Kimberlee Carman

27 Kimberlee Carman  
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